Regarding “Comments from The United Power Line Council” docket 03-104.

Quoting from the UPLC document…

“Access BPL systems do not intentionally emit radio frequency energy in order to communicate, and as such are appropriately classified as an unintentional radiator for purposes of Part 15.16 Access BPL systems are treated as carrier current systems that must meet specific radiated and conducted emission limits under the existing Part 15 limits.17 As Access BPL systems operate above 1.705 MHz (where there is no conducted emissions limit), as a practical matter only the radiated emissions limits apply to BPL operations.”

This is an inherently ridiculous comparison of what might be several primarily point source low power part 15 devices to a system that radiates a uniform and quite high RF field over an entire neighborhood. Whether BPL systems do not intentionally emit radio frequency energy is a moot point because they cannot operate without radiating energy.

A more valid comparison would be to calculate the RF power radiated for the entire BPL coverage area. This power level would be very large and would not escape severe regulation.

BPL is not a carrier current system per se with a discrete frequency being transmitted but is more likened to a broadband noise generator. As a licensed amateur user of some of these frequencies, and as a television viewer who occasionally views channels 2 through 5, and as a short wave listener who might choose to hear licensed broadcasts in the 1.7 to 80 MHz range, the interference from BPL will be intolerable.

I have seen studies that show tremendous interference to licensed services using these frequencies. The national benefits of having a ready cadre of skilled radio communicators will be lost to our nation. Television and short-wave listeners will lose access to desired programming.

Proven alternatives exist that do not impact radio amateurs, short wave listeners, or any other user of the HF frequencies. Coaxial cable, glass fiber, and wide area access via microwave is possible and practical. The power companies already own the poles and control the right-of-way. Let them run fiber and then they could provide true broadband. The electric lines are optimized for power delivery at 60 Hz. Not 6 MHz. Not 60 MHz.

Please deny any deployment of BPL.

BPL is a bad idea whose time should never come.

Respectfully submitted,

Patrick A. Thompson Sr.
Knoxville, Tennessee

Broadcast engineer
Amateur radio wa4tuk